

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HELENA KRIZEK,

Plaintiff,

v.

Case No. 1:24-cv-07727 (JHR)

NOTICE OF MOTION

THE QUEENS MEDICAL CENTER,
DR. CHERYLEE CHANG,
DR. THOMAS S. GALLAGHER,
DR. NOBUHIRO ARIYOSHI,
EDQUON LEE,ESQ.,
MARGARET WILLE AND ASSOCIATES LLC,
MARGARET WILLE, ESQ.,
WILLIAM A. BORDNER ESQ.,
DR. HAO CHIH HO,
LEGACY OF LIFE HAWAII,
HAWAII STATE DEPARTMENT OF HEALTH,
DR. CHRISTOPHER HAPPY,
MEDICAL EXAMINER OF HONOLULU, IN
HIS OFFICIAL AND INDIVIDUAL CAPACITY,

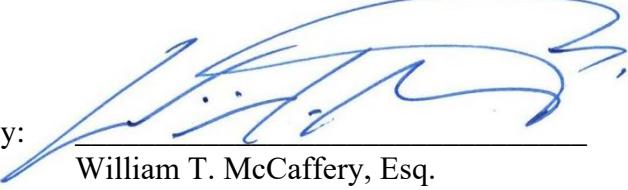
Defendants.

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PLEASE TAKE NOTICE, that upon the supporting memorandum of law, declaration of William T. McCaffery and exhibit annexed thereto, and declaration of Margaret Wille submitted in support thereof, defendants, Margaret Wille and Margaret Wille and Associates LLLC, incorrectly sued herein as Margaret Wille and Associates LLC, will move this Court, on a date and time to be determined by the Court, for an order pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(3) dismissing plaintiffs' Complaint, in its entirety, based on lack of personal jurisdiction and improper venue or in the alternative to transfer this action to the United States District Court for the District of Hawaii based on improper venue.

Dated: Melville, New York
January 2, 2025

L'ABBATE, BALKAN, COLAVITA
& CONTINI, L.L.P.

By: 

William T. McCaffery, Esq.

Attorneys for Defendants

Margaret Wille, Esq. and

Margaret Wille and Associates LLLC

Incorrectly sued herein as Margaret Wille and
Associates LLC

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All Attorneys of Record Via ECF